

EXHIBIT 4

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR,

Plaintiff, Pro Se,
3480 Pershing Ln
Washoe Valley, NV 89704
(775) 223-7899
Const2Audit@gmail.com

v.

WASHOE COUNTY, et al.

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

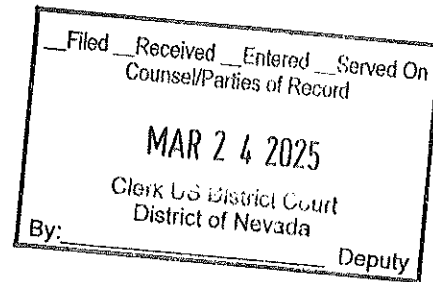


EXHIBIT 4

Title: Internal Communications Between Washoe County Library Director Jeff
Scott and KUNR Regarding Protest and Security Concerns at Drag Queen Story
Hour (DQSH)

Date: June 28, 2022

Source: Internal email correspondence between Washoe County Library System and KUNR

PLEADING TITLE - 1

1 Reporter Jose Davila IV

2 **Bates Number Range: EXH013-EXH018**

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6 **Description:**

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8 This exhibit contains internal emails between **Jeff Scott (Library Director, Washoe County**
9 **Library System)** and **Jose Davila IV (KUNR Public Radio Reporter)** regarding:

- 10
11 1. **Security concerns** surrounding the Drag Queen Story Hour (DQSH) event held in
12 **Sparks, NV.**
- 13 2. **Discussions** between **Washoe County Library System** and local law enforcement
14 about the conditions required for future DQSH events to be held at Sparks Library.
- 15 3. Confirmation that **Washoe County Library** would continue hosting DQSH events but
16 with additional security measures.
- 17 4. Library officials **expressing fear of public backlash and retaliation**, demonstrating
18 how event policies were developed based on potential **public opposition, not neutral**
19 **safety standards.**
- 20 5. **Jeff Scott's statement** that events could not return to Sparks unless **Sparks Police**
21 **Department** could guarantee "basic safety."
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26 **Relevance to Case:**

1 **✓ Supports First and Fourteenth Amendment Claims**

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- 3 • Demonstrates that **Washoe County Library System coordinated with law**
- 4 **enforcement** on security and access restrictions.
- 5 • Confirms that **government officials made discretionary decisions** regarding who could
- 6 **attend or report on public events, leading to viewpoint-based access restrictions**
- 7 **(Kreimer v. Bureau of Police, 958 F.2d 1242 (3d Cir. 1992)).**
- 8

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10 **✓ Refutes BOC's Motion to Dismiss**

- 11 • Confirms that **government actors played a central role** in controlling access to public
- 12 **events and coordinated security measures with law enforcement, reinforcing BOC's**
- 13 **state actor status** under *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982).
- 14

15

16 **✓ Relevant to Monell Liability (Washoe County & WCLS)**

- 17
- 18 • **Establishes that Jeff Scott and other high-ranking WCLS officials made top-down**
- 19 **decisions** regarding public access to library events.
- 20 • **Demonstrates viewpoint-based restrictions, making Washoe County liable under**
- 21 **Monell v. Dept. of Social Services, 436 U.S. 658 (1978).**
- 22 • **Shows evidence of prior planning regarding security-based event exclusion, proving**
- 23 **that restricting the public's access was an institutional policy rather than an**
- 24 **individual decision.**
- 25
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1 **CERTIFICATION OF EXHIBIT SUBMISSION**

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3 I, **Drew J. Ribar**, certify that this **Exhibit 4** accurately represents the original internal
4 communications obtained from Washoe County Library System records. This exhibit is
5 submitted in compliance with **Federal Rules of Evidence 901** for authentication.
6

7 Dated: **March 17, 2025**

8
9 **Respectfully Submitted,**

10
11 **/s/ Drew J. Ribar**

12
13 **Drew J. Ribar, Pro Se Plaintiff**
14 3480 Pershing Ln
15 Washoe Valley, NV 89704
16 (775) 223-7899
17 Const2Audit@gmail.com

18
19 **Dated:** March 17, 2025
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From: Jose Davila IV <jose@kunr.org>
Sent: 28 June 2022 18:11
To: Scott, Jeff
Subject: Re: Proud Boys at Sunday's event

Hi Jeff,

Understood. Thank you.

Best,
Jose

Jose Davila IV (he/him/his)
K-12 Education Reporter and Report for America Corps Member at KUNR Public Radio
kunr.org / reportforamerica.org
(415)755-5234
jose@kunr.org

From: Scott, Jeff <jscott@washoecounty.gov>
Sent: Tuesday, June 28, 2022 11:07 AM
To: Jose Davila IV <jose@kunr.org>
Subject: Re: Proud Boys at Sunday's event

Yes we plan to continue them. It is doubtful that it can return to Sparks without a guarantee of security and basic services. A library staff member who was interviewed did not want to go on camera for fear of retaliation. Until Sparks PD can guarantee basic safety in Sparks it cannot return.

Thanks
Jeff

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89505
(775) 327-8340
jscott@washoecounty.us

EXH0.13

From: Jose Davila IV <jose@kunr.org>
Sent: Tuesday, June 28, 2022 11:04:40 AM
To: Scott, Jeff <jscott@washoeconomy.gov>
Subject: Re: Proud Boys at Sunday's event

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]
Hi Jeff,

Sorry one more quick thing: do you plan to keep doing story times, especially drag queen ones, despite the incident?

Best,
Jose

Obtener [Outlook para iOS](#)

De: Jose Davila IV <jose@kunr.org>
Enviado: Tuesday, June 28, 2022 10:44:17 AM
Para: Scott, Jeff <jscott@washoeconomy.gov>
Asunto: Re: Proud Boys at Sunday's event

Okay, thank you! I'll reach out if I need those ones from Jamie but I think the ones that are posted are good enough anyway! Thank you!

Obtener [Outlook para iOS](#)

De: Scott, Jeff <jscott@washoeconomy.gov>
Enviado: Tuesday, June 28, 2022 10:38:21 AM
Para: Jose Davila IV <jose@kunr.org>
Asunto: Re: Proud Boys at Sunday's event

Absolutely! You can use what we posted online or Jamie Hemingway can send up photos and video directly.

Thanks

Jeff

EXH 014

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89505
(775) 327-8340
jscott@washoecounty.us

From: Jose Davila IV <jose@kunr.org>
Sent: Tuesday, June 28, 2022 10:36:09 AM
To: Scott, Jeff <jscott@washoecounty.gov>
Subject: Re: Proud Boys at Sunday's event

[NOTICE: This message originated outside of Washoe County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]
Hi Jeff,

Thank you so much for the clarification. I'm happy nothing else happened and no one was hurt. I'll let you know if we need to call, but I think this should be fine.

Also, unrelated, can we use the one of the photos that WCLS posted on Twitter for our web post of this story?

Best,
Jose

Obtener Outlook para iOS

De: Scott, Jeff <jscott@washoecounty.gov>
Enviado: Tuesday, June 28, 2022 10:31:49 AM
Para: Jose Davila IV <jose@kunr.org>
Asunto: Re: Proud Boys at Sunday's event

I'm at the Washoe County Board of County Commissioners now. I can give you a call later if you need more information.

Thanks

Jeff

EXH015

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89505
(775) 327-8340
jscott@washoecounty.us

From: Scott, Jeff <jscott@washoecounty.gov>;
Sent: Tuesday, June 28, 2022 10:30:38 AM
To: Jose Davila IV <jose@kunr.org>;
Subject: Re: Proud Boys at Sunday's event

Sorry for not getting back to you.

The proud boy protestors left at 1:05 and the Sparks PD (observing from several parking lots over at about 300 yards away) left right afterward. The gunman showed up at 1:17. One of our patrons was able to take a picture.

I would say that even though that there is some dispute as to who the gunman is (who according to Sparks PD can open carry even though the rifle was unslung and in his hand) I find the claim that he is not associated with the proud boys dubious. He was dressed in the same manner and showed up right after everyone left.

Thanks

Jeff

Jeff Scott
Library Director
Washoe County Library System
301 S. Center St. Reno, NV 89505
(775) 327-8340
jscott@washoecounty.us

From: Jose Davila IV <jose@kunr.org>;
Sent: Tuesday, June 28, 2022 10:17:12 AM
To: Scott, Jeff <jscott@washoecounty.gov>;

EXH016

Subject: Proud Boys at Sunday's event

[**NOTICE:** This message originated outside of Washoe County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Hi Jeff,

Thank you so much again for sitting down and talking on Saturday. I have left you a couple of voicemail messages but I figured I would ask here, too.

I just want to get a little more clarity on the end of the Proud Boys protest on Sunday in Sparks. I know Channel 4 reported that there was a Proud Boy that, towards the end of the protest, had a gun and approached the library. But I also heard from people on the scene that the Proud Boys left when a counterprotester who often open carries showed up. Can you offer any clarity on this?

Best,
Jose

Obtener Outlook para iOS

EXH 017